REMARKS/ARGUMENTS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are anticipated under the provisions of 35 USC § 102 (e) or obvious under the provisions of 35 USC § 103 (a). Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, the Applicants request that the Examiner telephone Ms. Janet M. Skafar, Esq. at telephone number (650) 988-0655 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Status of Claims

Claims 1-3, 6-12, 15-21, and 24-38 are pending in this application. Claims 4, 5, 13, 14, 22 and 23 are canceled. Claims 36-38 are new.

The Rejection of the Claims

Claims 1-3, 6-12, 15-21, and 24-27 are rejected under 35 USC § 102 (e) as being anticipated by the Skopec et al publication (U.S. Patent Publication No. 2004/0128299, filed on December 12, 2003). In response, Applicants have amended Claims 1, 10, and 19 to include the recitations of Claims 4 and 5; 13 and 14; and 22 and 23; respectively, and to more particularly point out the invention.

Because Claims 4 and 5; 13 and 14; and 22 and 23 are rejected as being obvious, Applicants respectfully maintain that Claims 1-3, 6-12, 15-21, and 24-27 are no longer anticipated by the Skopec et al publication.

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Claim 4 is rejected under 35 USC § 103 (a) as being unpatentable over the Skopec et al publication in view of the Anglin et al patent (U.S. Patent No. 5,930,824). Claim 5 is rejected as being unpatentable over the Skopec et al publication in view of the 2.7.8 Extended Format Sequential Data Sets document (hereinafter 2.7.8 document).

Applicants respectfully maintain that neither the combination of Skopec et al publication with the Anglin et al patent, nor the combination of the Skopec et al publication with of the 2.7.8 document, teach or suggest all the recitations of the claimed invention.

The Skopec et al publication is directed to a method for loading bulk data into a relational database. In the Skopec et al publication, a database with record data loaded therein is provided in a computer's main memory. A coordinating program is invoked as well as a standard load utility program that issues record data input requests, opens record data from external media and loads record data to the database therefrom. With the coordinating program record data input requests made by the load utility from external media are intercepted. Record data input requests from external media are replaced with record data input requests from the computer's main memory. Record data from the computer's main memory is inserted directly into the database by the load utility. As a result, delays encountered by reading of input files on the external media by the load utility is avoided thereby making the bulk loading of data into a database more efficient by reducing load time and freeing up computer resources. Therefore, the Skopec et al publication diverts the retrieval of data from external media to main memory.

Unlike the Skopec et al publication, the claimed invention does not divert the retrieval of data from external media to main memory. The claimed invention accesses the dataset on at least one disk, even though an open request to access the dataset

is associated with a first data structure that specifies a first access method, the first access method not being supported for the dataset.

Moreover, the Skopec et al publication does not teach that the access method used to access the data on the external media is not a supported access method for that dataset. Unlike the claimed invention, the replacement input routine of the Skopec et al publication is not to access the dataset on the external media such as a disk, but is used to access data in main memory.

Furthermore, neither the Anglin et al patent, nor the 2.7.8 document teach: accessing the dataset on at least one disk, the open request to access the dataset being associated with a first data structure that specifies a first access method, the first access method not being supported for the dataset.

Applicants respectfully maintain that one skilled in the art would not combine the teachings of the Skopec et al publication with the Anglin et al patent. The Skopec et al publication solves a different problem from the claimed invention. The Skopec et al publication is directed to a method for loading bulk data into a relational database. A coordinating program intercepts read requests issued by the load utility for the intermediate input files thereby significantly reducing the time required to load data into the relational database without incurring additional computer resource input. It is an object of the Skopec et al publication to provide an efficient method to load large quantities of data that is already contained in a computer's main memory. It is a further object of the Skopec et al publication to reduce the elapsed time and CPU time used when adding bulk data to relational database tables.

In contrast, the claimed invention is directed to accessing a dataset stored on at least one disk. The claimed invention solves the problem of accessing the dataset stored on at least one disk using an unsupported access method.

The Anglin et al patent is also directed to a different problem from the claimed invention. The Anglin et al patent is directed to a system and method for demand-based data recovery. The claimed invention is directed to accessing a dataset using an unsupported access method.

Furthermore, just because the Anglin et al patent discloses various types of access methods does not imply that the first access method is the Basic Direct Access Method (BDAM) which is replaced with a supported access method, and that the supported access method is a sequential access method.

The rejection indicates that the Skopec et al publication does not explicitly disclose the dataset is an extended format physical sequential dataset. The rejection asserts that the 2.7.8 document discloses that the dataset is an extended format physical sequential dataset. In paragraph [0004] the 2.7.8 document teaches that all sequential data sets accessed through the BSAM and QSAM access methods are eligible for conversion to extended format data sets. However, combining the teachings of the Skopec et al publication and the 2.7.8 document would not result in the claimed invention. Using the teachings of the Skopec et al publication, a request for data from an extended format data set on a disk would be intercepted and the data would be retrieved from main memory, rather than from the disk. Unlike in the claimed invention, using the teachings of the Skopec et al publication, the extended format dataset on the disk would not be accessed.

For the foregoing reasons, Applicants respectfully maintain that Claim 1 is not obvious and is patentable. Because Claims 2-3 and 6-9 depend from Claim 1, Applicants respectfully maintain that Claims 2-3 and 6-9 are patentable for the same reasons as Claim 1.

Claims 10 and 19 are amended to include the recitations of Claims 13 and 14; and 22 and 23, respectively, and have distinguishing recitations similar to Claim 1. Therefore, Applicants respectfully maintain that Claims 10 and 19 are patentable for the same reasons as Claim 1.

Because Claims 11-12 and 15-18; and 20-21 and 24-27 depend from Claims 10 and 19, Applicants respectfully maintain that Claims 11-12 and 15-18; and 20-21 and 24-27 are patentable for the same reasons as Claims 10 and 19, respectively.

Claims 9, 18 and 27

Claims 9, 18 and 27 have been amended to more particularly point out the invention. Claim 9 recites: qualifying the dataset to determine whether the first data structure is to be replaced based on the dataset being an extended format physical sequential dataset and the specified access method being the basic direct access method. Applicants respectfully maintain that neither the Skopec et al publication, nor the Anglin et al patent, nor the 2.7.8 document teach or suggest, explicitly or implicitly, this recitation of Claim 9. For the foregoing additional reasons, Applicants respectfully maintain that Claim 9 is patentable.

Claims 18 and 27 have similar distinguishing limitations as Claim 9, and Applicants respectfully submit that Claims 18 and 27 are patentable for the same reasons as Claim 9.

Claims 28-35

Claims 28-33 are rejected under 35 USC § 102 (e) as being anticipated by the Skopec et al publication. In response, Applicants have amended independent Claim 28 to more particularly point out the invention.

Applicants respectfully maintain that the Skopec et al publication does not teach, explicitly or implicitly, each and every recitation of Claim 28. Claim 28 has the following recitations: An article of manufacture comprising a computer usable medium embodying instructions executable by a computer for performing a method of accessing a dataset stored on at least one disk, the method comprising: intercepting an open request to access the dataset, the open request being associated with a first data control block that specifies an unsupported access method for the dataset; in response to said intercepting, invoking an open screen module, the open screen module issuing a second open request to open the dataset using a supported access method for the dataset, the supported accesses method being specified in a second data control block; intercepting the second open request; in response to said intercepting the second open request, invoking the open screen module; in response to the open screen module determining that the second open request is to be processed using an operating system open module, processing the second open request using the operating system open module to open the dataset using the supported access method, and providing an address of a supported access module; replacing, by said open screen module, the first data control block with a second data control block that specifies the supported access method; storing an address of a shadow access interface module in the second data control block; and accessing the dataset by invoking the shadow access interface module, and the shadow access interface module invoking the supported access module using the address of the supported access module, to access the dataset in accordance with the second access method.

The Skopec et al publication discloses the use of an SVC screening table which is an MVS device that tells the operating system to bypass its own supervisor call routines and gives the operating system the address of a replacement routine. The Skopec et al publication discloses an Open Hook routine that is called when MVS issues an SVC 22, which is an open that allows authorized access. The Sample Open Hook routine establishes addressability, turns off SVC screening, establishes an environment prior to

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open -- including setting back to the key of a "real" open statement (SVC 22), issues the "real" SVC 22, switches back to key 0, and re-establishes addressability to the controlling program environment, and subsequently turns on SVC screening. Therefore, the Skopec et al publication teaches turning SVC screening on and off in the open hook routine. In this way, the Skopec et al publication prevents the Open Hook routine from being called in response to the "real" SVC 22 which is issued by the Open Hook routine.

In contrast, the claimed invention uses a completely different technique from that disclosed in the Skopec et al publication. The claimed invention has the following recitations: intercepting an open request to access the dataset, the open request being associated with a first data control block that specifies an unsupported access method for the dataset; in response to said intercepting, invoking an open screen module, the open screen module issuing a second open request to open the dataset using a supported access method for the dataset, the supported accesses method being specified in a second data control block; intercepting the second open request; in response to said intercepting the second open request, invoking the open screen module; in response to the open screen module determining that the second open request is to be processed using an operating system open module, processing the second open request using the operating system open module to open the dataset using the supported access method, and providing an address of a supported access module.

Unlike in the claimed invention, the technique of the Skopec et al publication does not intercept the "real" SVC 22 issued by the open hook routine. The Skopec et al publication turns off SVC screening which prevents the "real" SVC 22 from being intercepted. The open hook routine of the Skopec et al publication is not invoked in response to an intercept of the "real" SVC 22.

As discussed above with respect to Claim 1, the Skopec et al publication diverts the retrieval of data from external media to main memory. Unlike the Skopec et al

publication, the claimed invention does not divert the retrieval of data from external media to main memory. The claimed invention accesses the dataset on at least one disk, even though an open request to access the dataset is associated with a first data structure that specifies an unsupported access method for the dataset.

Moreover, the Skopec et al publication does not teach that the access method used to access the data on the external media is not a supported access method for that dataset. Unlike in the claimed invention, the replacement input routine of the Skopec et al publication is not to access the dataset on the external media, such as a disk, but is used to access data in main memory.

For the foregoing reasons, Applicants respectfully maintain that Claim 28 is not anticipated by the Skopec et al publication. Because Claims 29-33 depend from Claim 28, Claims 28-33 are not anticipated for the same reasons as Claim 28.

Claim 34

Claim 34 is rejected under 35 USC § 103 (a) as being unpatentable over the Skopec et al publication as applied to Claim 28 and further in view of the Anglin et al patent.

As discussed above, with respect to Claim 28, the Skopec et al publication does not teach each and every recitation of Claim 28. Therefore, Applicants respectfully maintain that neither the Skopec et al publication nor the Anglin et al patent, alone or in combination, explicitly or implicitly, teach or suggest all the recitations of Claim 34.

In addition, as discussed above with respect to Claim 1, the Applicants maintain that one skilled in the art would not be motivated to combine the teachings of the Skopec et al publication with the Anglin et al patent.

For the foregoing reasons, Applicants respectfully maintain that Claim 34 is not obvious and is patentable.

Claim 35

Claim 35 is rejected under 35 USC § 103 (a) as being unpatentable over the Skopec et al publication as applied to Claim 28 and further in view of the 2.7.8 document.

As discussed above, with respect to Claim 28, the Skopec et al publication does not teach each and every recitation of Claim 28. Therefore, the combination of the Skopec et al publication with the 2.7.8 document, does not teach or suggest, implicitly or explicitly, all the recitations of Claim 35.

For the foregoing reasons, Applicants respectfully maintain that Claim 35 is not obvious and is patentable.

New Claims 36-38

New Claims 36, 37 and 38 depend from Claims 1, 10 and 19, respectively, and recite additional distinguishing recitations.

Claim 36 has the recitations of: in response to said intercepting the open request to access the dataset, invoking an open screen module; issuing, by the open screen module, another open request, the another open request being associated with the second data structure, wherein the second access method is specified in the second data structure; intercepting the another open request; in response to said intercepting the another open request, invoking the open screen module; and in response to the open screen module

determining that the another open request is to be processed using an operating system open module, processing the another open request using an operating system open module to open the dataset using the supported access method.
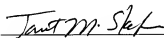
Applicants respectfully maintain that neither the Skopec et al publication, the Anglin et al patent, nor the 2.7.8 document teaches, expressly or inherently, alone or in combination, the additional recitations of Claim 36, and that Claim 36 is patentable. Claims 37 and 38 are similar to Claim 36, and are patentable for the same reasons as Claim 36.

Conclusion

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

February 2, 2007

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